

# EXHIBIT C

**In the Matter Of:**

**JILL DILLARD**

**VS**

**CITY OF SPRINGDALE**

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**JINGER VUOLO**

*September 20, 2021*

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## ALSO PRESENT:

Garrett Smelley, Certified Legal Video Specialist



1 Q. Okay. Have you done any post-high school  
2 education, any college or anything?

3 A. No.

4 Q. Okay. Do you work outside the home currently?

5 A. No.

6 Q. When were you married?

7 A. November 5th, 2016.

8 Q. Okay. And how old were you at that time?

9 A. 23.

10 Q. Since you've been married, have you ever worked  
11 outside the home?

12 A. No.

13 Q. Have you -- have you ever worked for income?

14 A. Yes.

15 Q. What work have you done for income?

16 A. TV show, brand partnerships, author, and a  
17 company.

18 THE COURT REPORTER: And what? I'm  
19 sorry.

20 THE WITNESS: A company.

21 Q. What's the name of this company?

22 A. It's not -- it doesn't exist now.

23 Q. What was the name of the company?

24 A. Hope & Stead.

25 Q. What did that company do?

1 A. Products.

2 Q. What kind of products?

3 A. Hats, candles.

4 Q. Okay. And when did the company go out of  
5 business?

6 A. This year.

7 Q. Okay. You and your husband wrote a book called  
8 The Hope We Hold; is that correct?

9 A. Correct.

10 Q. Have you written any other books or published  
11 materials?

12 A. Yes.

13 Q. What else have you written?

14 A. Growing Up Duggar.

15 Q. Okay. Anything else?

16 A. No.

17 Q. Okay. I can't recall which, but one of your  
18 sisters indicated in her deposition that there was a  
19 ghostwriter, to use the term, for Growing Up Duggar.  
20 Do you recall that?

21 A. Yes.

22 Q. Did you and your husband have a ghostwriter on  
23 The Hope We Hold?

24 A. Yes.

25 Q. Who was that person?

1 A. Bethany Mauger.

2 Q. Bethany. Can you spell that last name for me,  
3 or try?

4 A. M-a-u-g-e-r.

5 Q. Okay. You indicated that you made some income  
6 through brand partnerships. What brands have you  
7 partnered with?

8 A. A lot.

9 Q. Do you remember any of them?

10 A. Yes.

11 Q. What would those be?

12 A. Skillshare, Bombay Hair. I'm trying to think.  
13 Sorry.

14 Q. Sure.

15 A. I'm sorry.

16 Q. On those two, or as many as you remember, Bombay  
17 Hair, I assume, is hair products?

18 A. Yes.

19 Q. Okay. What is Skillshare? Did I hear that  
20 right?

21 A. Yes.

22 Q. What is that?

23 A. It's an online thing where people can learn  
24 about, just, different things that they want to  
25 explore, whether art, photography, cooking. And it

1 just has, like, online videos that people can sign up  
2 for to watch and learn more. Yeah. Learning skills  
3 online.

4 Q. That's a subscription service, it looks like?

5 A. Yes, it is.

6 Q. Okay. How did you -- let's talk specifically  
7 with respect to these two brands. How did you partner  
8 with them? What form did that take?

9 A. CEG.

10 Q. What is CEG?

11 A. It's where influencers can go to get  
12 partnerships.

13 Q. Okay. CEG is, like, an agency?

14 A. Correct.

15 Q. Okay. So what did you do for Skillshare, for  
16 instance?

17 A. I did a short Instagram story talking about the  
18 program and how I learned photography from it, and  
19 then I posted that on my Instagram.

20 Q. Okay. Same thing for Bombay Hair, did a social  
21 media post about it?

22 A. Yes. Yes.

23 Q. And would that be true for all of your brand  
24 partnerships? Is that how you partnered with them?

25 A. Most all of them, yes.



1 Q. Okay. So would you enter into a contract with  
2 these brands before you did these posts? You pay me X  
3 and I'll do a post or two or ten?

4 A. Most of the time, yes.

5 Q. Okay. What social media platforms are you on?

6 A. Facebook and Instagram and TikTok.

7 Q. Okay. Ballpark, what did you make last year,  
8 all income for you? Not your husband, but for you.

9 A. Not exactly sure right now off the top of my  
10 head.

11 Q. Yeah. More or less than 100,000?

12 A. More.

13 Q. Okay. More or less than 200,000?

14 A. Less.

15 Q. Okay. Is most of that income the social media  
16 partnerships, or is most of that coming from somewhere  
17 else?

18 A. Yes.

19 Q. Most of it coming from the social media?

20 A. Social media is the majority.

21 Q. Okay. I'm trying to recall your husband's  
22 deposition. It's been a minute. Y'all live in  
23 California, correct?

24 A. Correct.

25 Q. And where he pastors a church, if I recall; is

1 A. It's been much harder knowing that people know  
2 things they weren't supposed to.

3 Q. Okay. How has that made your life harder?

4 A. In every way. Just emotionally, physically.  
5 It's been difficult.

6 Q. Okay. Well, let's -- let's talk about that.  
7 Financially, you're making substantially more money  
8 than you made in 2015, correct?

9 MR. BLEDSOE: Object to the form.

10 A. No. I don't know. I don't know.

11 Q. You think you made more than \$100,000 in 2015?

12 A. I don't recall.

13 Q. Okay. Would your tax returns show that?

14 A. Yes.

15 Q. Okay. What about relationally; is your marriage  
16 worse than it was six years ago?

17 A. No.

18 Q. Okay. It's better, isn't it?

19 MR. BLEDSOE: Object to the form.

20 A. It's great.

21 Q. Okay. How about your relationship with your  
22 children? Has it gotten better or worse since 2015?

23 A. They weren't born.

24 Q. They weren't even around, were they? Okay.

25 Have your -- your children have certainly made your

1 anguish?

2 A. A little bit.

3 Q. Okay. I understand that your grandmother passed  
4 away suddenly several years ago; is that correct?

5 A. Yes.

6 Q. Did that cause you emotional distress or mental  
7 anguish?

8 A. I was sad.

9 Q. Okay. Does your book discuss your abuse by  
10 Josh?

11 A. I don't say that, no.

12 Q. Okay. Does your book discuss the redacted  
13 disclosures and this lawsuit?

14 A. No.

15 Q. Okay. Shouldn't the public be aware of a sexual  
16 predator in their community who has sexually abused at  
17 least five people?

18 MR. BLEDSOE: Object to the form.

19 A. Yes.

20 Q. Okay. Have you ever been diagnosed by a  
21 physician with any mental or emotional health  
22 problems?

23 MR. BLEDSOE: Object to the form.

24 A. I don't know.

25 Q. You don't know. Okay.

1 to, like, do videos for, then I'll record those. And  
2 then it depends on the day because we are pretty  
3 flexible. My husband has school. So some days, it's,  
4 like, we'll do Hebrew studies in the evening together.  
5 Not because I'm good at it, but he's in Hebrew class.  
6 So we'll do flashcards.

7 And then we'll have dinner together. And  
8 oftentimes, we'll go out on a family drive, go see a  
9 site in LA. And then, yeah. I don't know. That's  
10 our typical day. Put the kids to bed, relax, and play  
11 a game of Uno.

12 Q. Good. Okay. You had mentioned partnerships. I  
13 am going to bounce around. I'm going back to social  
14 media because you had mentioned partnerships. How  
15 many partnerships do you have right now?

16 A. How many right now? Well, it's not -- they're  
17 not continual, like continuing. So it is -- the way  
18 that works, they are random partnerships.

19 So if -- sometimes, you will have a block  
20 of partnerships that it's, like, you're going to do  
21 five of these. And a lot of those are the ones that  
22 end up getting canceled. And then you'll have some  
23 single ones that people don't want to be associated  
24 with us because of all that stuff, and they will drop  
25 out as well.

1 Q. Okay. I'm sorry. I didn't -- I'm going to have  
2 to break that down. And I apologize. It's really  
3 kind of a lingo I don't speak, so -- because I'm a lot  
4 older than you. So let me start off by saying this.  
5 You said there was a block of partnerships. Would  
6 there be five of those?

7 A. That you do for one company, you'll do five ads  
8 over five months or so. For instance, I -- yeah.  
9 Because I had -- I've had multiple ones of those where  
10 they say, "Okay. You're going to do three  
11 partnerships. Once a month, you'll post on --  
12 something on hair." You know, like a hair product.  
13 So once a month, I do a post on it.

14 Q. Okay. So are you currently -- but you were  
15 saying that these kind of are cyclical, that you'll do  
16 it for a while and then not?

17 A. No. I'm constantly -- I continually do them.  
18 So I'll do about four a month maybe, if not more.

19 Q. Okay. And which ones are you currently -- who  
20 are you currently working with?

21 A. I'm currently -- well, as of, like, something  
22 hasn't been posted yet, PatPat kid's clothing. I just  
23 got another one for a vacuum cleaner. It's, like, a  
24 Robot vacuum cleaner-type thing. It's not Robot.  
25 It's -- oh, what is the name? Jessa just did this

1 one, too. I can't remember what's called though.  
2 It's -- because I haven't done it yet. It's just like  
3 another month. But then I'm trying to think of the  
4 recent ones that I just had posted. I did -- I did a  
5 ton with my BrushX.

6 Q. With what? I'm sorry.

7 A. My BrushX

8 Q. My BrushX?

9 A. Yeah.

10 Q. Okay. Go ahead. And you had just stated that  
11 there were some that you get canceled, and I can't  
12 remember the terminology as to why. Are there  
13 partnerships that have been -- that you had that have  
14 been canceled?

15 A. Yes.

16 Q. Okay. Is canceled the right terminology?

17 A. I think so. I don't know actually. I mean,  
18 because they -- they just decided to drop out.

19 Q. Okay.

20 A. Because of -- not because of anything we've done  
21 but because of the all of this stuff in the family, my  
22 family, my --

23 Q. Tell me what that -- tell me more about that.  
24 When you say because of --

25 A. I'm not saying -- no. I put myself in with that

1 because when I was younger, like, a lot of those  
2 things would happen. We would have those  
3 partnerships. But now, that is a recurring theme from  
4 the molestation, all of those documents being  
5 released, they're, like, we don't want to be  
6 associated with all of what happened. And so we've  
7 had that happen to us and lost partnership deals.

8 Q. Which partnerships deals have you lost?

9 A. I can't remember the names of those right now,  
10 but yeah. I could try to recall those, given time.

11 Q. Okay. How were you provided information that  
12 the partnership -- as to why the partnership deals  
13 were lost? That was a bad question, but what I'm  
14 trying to figure out is, when you said, "We lost  
15 partnerships" because of us and your family?

16 A. Through a manager.

17 Q. Who is that?

18 A. Well, now, I mean, I think at that time, there  
19 was Chad Gallagher for a while, and then The Gift  
20 Shop.

21 Q. Did you work with the Gift Shop at one point?  
22 Did you work with The Gift Shop?

23 A. We are working with the Gift Shop.

24 Q. You are currently? But The Gift Shop, whoever  
25 your contact is at The Gift Shop has told you that you

1 lost partnerships because of the release of the  
2 information?

3 A. I don't know entirely, but I know that it was --  
4 yeah. They had mentioned that it was because of a lot  
5 of that family stuff. So I didn't -- you would have  
6 to ask -- I don't know. I'd have to ask them and see.

7 Q. Okay. Do you recall which partnerships with The  
8 Gift Shop were lost?

9 A. I know there was -- there was one -- there were  
10 two, but I don't want to get them wrong. I was going  
11 to do an event and then I was going to do another  
12 partnership over the holidays.

13 Q. And when was the event that you were supposed to  
14 do?

15 A. I can't recall the exact date, but I think  
16 December.

17 Q. Of what year? December of what year?

18 A. Of -- what's that? 2020, I believe.

19 Q. So you were going to do that. That was arranged  
20 for you to do after the release of the 2015 report,  
21 correct?

22 A. Correct.

23 Q. Okay. And it was canceled, did you say, in  
24 December of 2020?

25 A. Yes.



1 Q. Do you know what happened in December of 2020  
2 that would have --

3 A. I don't recall.

4 Q. Let me just get my question out. Just because  
5 we're --

6 A. Sorry about that.

7 Q. You're just fine. What happened in December of  
8 2020 that would have caused the partnership to cancel  
9 the event you were supposed to do?

10 A. I don't recall what happened then, but I know  
11 what happened before.

12 Q. What happened before?

13 A. The release of records that were not supposed to  
14 be made public, and it's still affecting us every day.

15 Q. Have you been advised that you lost partnerships  
16 for reasons other than the release of the information?

17 A. I don't know.

18 Q. Have you been advised that you've lost  
19 partnerships because of your family's views on LGBTQ  
20 issues?

21 A. I don't know. Potentially.

22 Q. When you say, "I don't know," I'm sorry. I'm  
23 trying to understand what part of that you don't know.  
24 Do you -- have you ever been advised that you -- you  
25 have lost partnerships because of your family's views

1 on LGBTQ issues?

2 A. That we have because of my family? I mean, yes.  
3 They have. They have that.

4 Q. I don't mean to talk over you. I'm sorry. Go  
5 on.

6 A. No. I just said yes. They have -- they have --  
7 you know, I know they've lost because of that.

8 Q. What have they lost because of that?

9 A. I'll let them answer that.

10 Q. No. I'm asking you. As you sit here -

11 A. What have I lost?

12 Q. No. What -- what -- what partnerships has your  
13 family lost because of LGBTQ?

14 A. I don't -- I don't know their stuff. I don't  
15 know of all the ins and out of all of that.

16 Q. Do you know, as you sit here right now, if they  
17 have lost partnerships because of --

18 A. I don't know. I don't know. I'm saying some of  
19 my siblings, though, they probably have. I don't know  
20 though. I don't know all the ins and outs.

21 Q. All right. And I understand you don't know all  
22 the ins and outs. I'm just trying to know what  
23 information you do have that --

24 A. I don't have information.

25 Q. Okay. You mentioned earlier when you were

1 Q. Okay.

2 A. I've never been -- it's only been in, like, a  
3 manager or someone else has done an occasional post.  
4 But I haven't done that.

5 Q. Okay. Who does access -- which managers do have  
6 access to your Facebook?

7 A. It would have been The Gift Shop.

8 Q. Okay.

9 A. Yeah.

10 Q. You mentioned another company earlier I thought.  
11 I had written down CEG.

12 A. CEG was -- yeah. CEG, so I just went to them.  
13 They didn't -- they're not -- like, they're a brand  
14 company that was -- had -- they're an agency, I guess  
15 is the word. They have brands that, if you just want  
16 to get a brand deal quickly, you just go to them and  
17 they set it up with influencers. You don't have to be  
18 under them. So I was never under them. I just kind  
19 of took one and off brand deals from them on occasion.

20 Q. Okay.

21 A. And I'm not working with them.

22 Q. You're not working with them?

23 A. No. I'm not working alongside them. I would  
24 just take, like -- say, "Oh, yeah. I want to do this  
25 one brand partnership." So they would -- they had

1 just a couple of offers. Every once in a while, they  
2 would have a brand partnership for me, but I was never  
3 working for them or under them. It was just a single,  
4 like, oh, do just one partnership and be done.

5 Q. Is that how The Gift Shop operates?

6 A. No.

7 Q. How about Chad Gallagher? Do you work with  
8 Chad Gallagher?

9 A. No.

10 Q. Have you personally worked with Chad Gallagher?

11 A. Yes, we did for a little bit.

12 Q. When was that?

13 A. Goodness, I don't remember the date.

14 Q. Since you've been married?

15 A. For a very short time. Then we split ways.

16 Q. Why did you decide to split ways?

17 A. We just wanted to go a different direction.

18 Q. What was the difference in the direction?

19 A. I don't know. Personality.

20 Q. Yeah.

21 A. Skills.

22 Q. When you say "skills," are you referring to  
23 Mr. Gallagher's?

24 A. I'm just saying the direction that we were  
25 going, we just wanted to go and have somebody who,

## REPORTER CERTIFICATION

STATE OF ARKANSAS )

COUNTY OF PULASKI )

I, TAMMIE L. FOREMAN, Certified Court Reporter in and for the aforesaid county and state, do hereby certify to the following:

1) The foregoing deposition was taken before me at the time and place stated in the foregoing styled cause with the appearances as noted;

2) Being a Certified Court Reporter, I then reported the deposition in Stenotype to the best of my skill and ability, and the foregoing pages contain a full, true, and correct transcript of my said Stenotype notes then and there taken;

3) I am not in the employ of and am not related to any of the parties or their counsel, and I have no interest in the matter involved;

4) Signature of the witness is not waived.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office this 30th of September, 2021.



A handwritten signature in cursive script that reads "Tammie L. Foreman".

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